

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION III**

**1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

Memo: To: Craig Yussen

Date: 4/5/2017

From: Kurt Rutzmoser

Subject: Headstrong Foundation, Site Inspection conducted 1/9/2017

Site visited by Kurt Rutzmoser and Tim Korbar

The EPA conducted an active work site inspection of Headstrong Foundation, 200 South Chester Road, Swarthmore, PA on January 9, 2017 in response to a tip complaint from a neighbor.

An EPA RAV system complaint was received on January 4, 2017 and forwarded to EPA inspector Albert Korbar on January 6, 2017. Inspector Korbar spoke with [REDACTED] (b) [REDACTED], who indicated that currently active renovations were taking place and that Renovation Repair and Painting Rule protocols were not being followed.

Prior to the site visit a Real Quest report was obtained and it stated that the property at 200 South Chester road was constructed in 1890.

Prior to the site visit photographs of the renovation work were posted on the Headstrong Foundation web site and printed out.

On January 9 at approximately 10 AM, Inspector Kurt Rutzmoser and Albert Korbar arrived at 200 South Chester Road, Swarthmore, PA to conduct an inspection of the site and to collect information concerning the work being accomplished at the site. Upon arrival, the inspectors observed a large uncovered dumpster at the rear of the building. The inspectors heard construction sounds (hammering) coming from the basement stairwell and proceeded to enter the building through the basement entrance. Inspector Rutzmoser called out and asked for permission to come in, and Pat Colleluori responded giving permission. The inspectors identified themselves to Mr. Colleluori (credentials were presented), and Inspector Rutzmoser and Mr. Colleluori signed the Consent for Access to the site.

Mr. Colleluori was accomplishing masonry work on the basement walls, removal of the painted cement layer exposing the stone work of the foundation and repointing the stones. The inspectors observed that the painted partitioned walls removed were greater than 12 square feet. Inspectors observed no plastic tarp being used.

The inspectors discussed the work that already had been accomplished with Pat Colleluori and Mr. Colleluori indicated that the work that was accomplished included the removal of the ceiling and the removal of partition walls. This work was accomplished to open up and expose the wires and plumbing.

Mr. Colleluori stated that he was not familiar with the RRP rule but he was sure that the contractor managing the renovations was licensed properly and was obtaining all the necessary permits.

Mr. Colleluori indicated that Target Building Construction was managing the renovations at the site. The inspectors discussed the purpose of the RRP Rule with Mr. Colleluori and explained that it was to contain the lead dust during renovations of pre-1978 target housing. The inspectors explained that a certified renovator should oversee the renovations on the project.

Mr. Colleluori was upset because they had experienced permitting problems when the foundation had entered the community. Mr. Colleluori did not have the information concerning Target Building and he called his wife to obtain the information. Inspector Rutzmoser spoke with Mrs. Colleluori, and obtained the information concerning Target Building and Inspector Rutzmoser indicated to Mrs. Colleluori that he would send a contractor's information packet to the 232 Green Street address.

Inspector Rutzmoser and Korbar thanked Mr. Colleluori for his time and left the property.

An inspection was set for Target Building Construction Inc. for 2/14/2017 which was postponed.

Headstrong Foundation provided documentation of their non-profit renovations to EPA compliance personnel.